

Exhibit 4

From: [Christopher Geddis](#)
To: [Bonner, Kelly](#)
Cc: [Goldberg, Seth A.](#); [Priselac, Jessica](#); [Schwartz, Barbara](#); [Hill, Coleen W.](#); [Hansen, Forrest](#); [Adam Slater](#); [lhilton@kanner-law.com](#); [George T. Williamson](#); [Cheryll Calderon](#); [David Hobbs](#)
Subject: FW: Valsartan MDL - Plaintiffs' Motion to Compel Custodial File of Baohua Chen
Date: Monday, May 17, 2021 6:20:00 PM
Attachments: [Judge Vanaskie ltr re Baohua Chen Custodial File Final.pdf](#)
[image001.jpg](#)

Counsel,

Some of the exhibits to Plaintiffs' letter are subject to your current motion for a protective order. In light of the public interest in the contamination of ZHP's valsartan and its knowledge of the more widespread problem at least a year before the recalls, Plaintiffs challenge the confidentiality of the remaining exhibits as described in their letter.

Best,
Chris

From: Christopher Geddis
Sent: Monday, May 17, 2021 6:19 PM
To: Hill, Coleen W. <CWHill@duanemorris.com>; 'TIV@stevenslee.com' <TIV@stevenslee.com>
Cc: Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Priselac, Jessica <JPriselac@duanemorris.com>; Schwartz, Barbara <BASchwartz@duanemorris.com>; Dedaj, Jovalin <JDedaj@duanemorris.com>; 'valpec@kirtlandpackard.com' <valpec@kirtlandpackard.com>; Adam Slater <ASlater@mazieslater.com>
Subject: RE: Valsartan MDL - Plaintiffs' Motion to Compel Custodial File of Baohua Chen

Dear Judge Vanaskie,

On behalf of Adam Slater, please see attached for Plaintiffs' reply to ZHP's opposition to Plaintiffs' request for the production of Baohua Chen's custodial file. The exhibits to the unredacted letter are available at the following link:

 If you have any difficulty accessing these documents, please let me know.

Respectfully,
Chris

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From: Hill, Coleen W. <CWHill@duanemorris.com>

Sent: Friday, May 14, 2021 3:38 PM

To: 'TIV@stevenslee.com' TIV@stevenslee.com

Cc: Goldberg, Seth A. SAGoldberg@duanemorris.com; Priselac, Jessica JPriselac@duanemorris.com; Schwartz, Barbara BASchwartz@duanemorris.com; Dedaj, Jovalin JDedaj@duanemorris.com; 'valpec@kirtlandpackard.com' <valpec@kirtlandpackard.com>; Adam Slater <ASlater@mazieslater.com>; Christopher Geddis <CGeddis@mazieslater.com>

Subject: Valsartan MDL - ZHP Parties' Unredacted Brief in Opposition to Plaintiffs' Motion to Compel Custodial File of Baohua Chen

Dear Judge Vanaskie,

On behalf of Seth Goldberg, attached please find the ZHP Parties' unredacted papers in support of their opposition to Plaintiffs' motion to compel the custodial file of Baohua Chen and cross motion for protective order.

Kind regards,
Coleen



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